

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION

UNITED STATES OF AMERICA

v.

Case No. **7:19-CR-015-O**

JERRIE LEE SYON (01)

FACTUAL RESUME

I. Plea:

The defendant is pleading guilty to Count One of the Information. The Information charges Possession with Intent to Distribute Methamphetamine, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

II. Penalties:

The penalties the Court can impose include:

- a. imprisonment for a period not to exceed twenty (20) years;
- b. a fine not to exceed one million dollars (\$1,000,000), or both such fine and imprisonment;
- c. a term of supervised release of not less than three (3) years, which may be mandatory under the law and will follow any term of imprisonment. If the defendant violates any condition of the term of supervised release, the Court may revoke such release term and require that the defendant serve an additional period of confinement;
- d. a mandatory special assessment of \$100;
- e. forfeiture of property; and
- f. costs of incarceration and supervision.

III. Elements of the Offense:

In order to establish the offense alleged in Court One of the Superseding Information, the government must prove the following elements beyond a reasonable doubt:

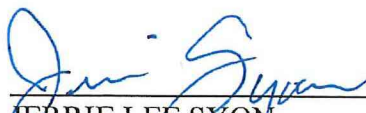
- First: That the defendant knowingly possessed a controlled substance;
- Second: That the substance was in fact methamphetamine; and
- Third: That the defendant possessed the substance with the intent to distribute it.

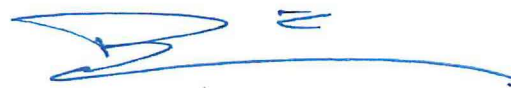
IV. Stipulated Facts:

On August 14, 2018, Investigators with DPS contacted Jerrie Lee Syon via cellular phone and text messages and arranged the purchase of one half ounce of methamphetamine in Wichita Falls, Texas. On this same date, a DPS Investigator, acting in an undercover capacity, met Syon in Wichita Falls, Texas. During the meeting, Syon handed the DPS undercover investigator two packages wrapped in black electrical tape, containing what Syon identified as methamphetamine. The DPS undercover investigator in turn handed Syon three hundred and fifty dollars (\$350.00) to pay for the methamphetamine.

Jerrie Lee Syon stipulates to the above facts, and that she possessed the above-described methamphetamine with intent to distribute it.

AGREED AND STIPULATED on this 30<sup>th</sup> day of August, 2019.

  
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JERRIE LEE SYON  
Defendant

  
\_\_\_\_\_  
DUSTIN EUGENE NIMZ  
Counsel for Defendant